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10 Attorneys for Plaintiffs and Cross-Defendants  
 11 CISCO SYSTEMS, INC. and  
 CISCO TECHNOLOGY, INC.

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 13  
 14 **UNITED STATES DISTRICT COURT**  
 15 **NORTHERN DISTRICT OF CALIFORNIA**  
 16 **SAN FRANCISCO DIVISION**  
 17

18 CISCO SYSTEMS, INC., a Delaware  
 corporation, and CISCO TECHNOLOGY,  
 19 INC., a California corporation,

20 Plaintiffs,

21 v.

22 DEXON COMPUTER, INC., a Minnesota  
 23 corporation,

24 Defendant.

25  
 26 AND RELATED CROSS-ACTIONS  
 27

Case No. 3:20-cv-04926 CRB

**PLAINTIFFS CISCO SYSTEMS, INC.  
 AND CISCO TECHNOLOGY, INC. AND  
 DEFENDANT DEXON COMPUTER,  
 INC.'S JOINT MOTION TO ENTER  
 STIPULATED PERMANENT  
 INJUNCTION AND, THEREAFTER, TO  
 DISMISS CLAIMS, AND ~~[PROPOSED]~~  
 ORDER**

Plaintiffs Cisco Systems, Inc. and Cisco Technology, Inc. (together, “Plaintiffs”) and Defendant Dexon Computer Inc. (“Defendant,” and collectively with Cisco, the “Parties”), hereby file this stipulated joint motion for entry of a Stipulated Permanent Injunction and dismissal of claims without prejudice.

The Parties stipulate and agree that there is good cause to enter the Permanent Injunction below because the Parties have settled their dispute, which includes entry of this injunction, the request is unopposed, and the Permanent Injunction is stipulated.

In conjunction with entry of this Stipulated Permanent Injunction, Plaintiffs have agreed to dismiss the claims in this action against Defendant without prejudice, and the Parties request the Court to retain jurisdiction to enforce the Stipulated Permanent Injunction and the settlement agreement.

Therefore, the Parties jointly stipulate, and request that the Court enter an ORDER, as follows:

1. Defendant, including any of its officers, agents, servants, representatives, employees, attorneys, affiliated companies (including but not limited to Optdex and Core92, Inc., and any other rebranded affiliate by Defendant), assigns, successors in interest, and all persons in active concert or participation with it who receive actual notice of this Order, by personal service or otherwise, shall be forever restrained and enjoined from:

a. Intentionally purchasing or selling counterfeit Cisco products.

b. For purpose of clarity, Dexon will not violate this injunction if it sells a Cisco product that turns out to be counterfeit so long as Dexon used Cisco’s authentication tools provided by Cisco prior to the sale of such product and the tool reported that the packaging for the subject product was genuine.

2. Cisco shall provide Dexon with written notice of any alleged violation of this injunction and five (5) days to cure such breach before bringing any proceeding to enforce this injunction. The bond that Cisco previously furnished in connection with the preliminary injunction is extinguished and may be returned to Cisco.

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3. Cisco's claims against Defendant are hereby dismissed without prejudice in this action, pursuant to the Parties' Settlement Agreement and Fed. R. Civ. Proc. Rule 41(a)(2), and the Court shall retain jurisdiction to entertain such further proceedings and to enter such further orders as may be necessary or appropriate to enforce the provisions of this Injunction or the Parties' settlement agreement.

**IT IS SO STIPULATED AND REQUESTED THAT THE COURT SO ORDER.**

DATED: March 7, 2024

SIDEMAN & BANCROFT LLP

By: /s/ Richard J. Nelson  
Richard J. Nelson  
Attorneys for Plaintiffs  
Cisco Systems, Inc. and Cisco Technology, Inc.

DATED: March 7, 2024

TAFT STETTINUIUS & HOLLISTERR LLP

By: /s/ Michael M. Lafeber  
Michael M. Lafeber (admitted *pro hac vice*)  
Attorneys for Defendant and Third-Party Plaintiff  
Dexon Computer, Inc.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: March 8, 2024

  
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CHARLES R. BREYER  
United States District Judge